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January 13, 2014

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*Application granted  
after consultation  
with Pretrial  
Services and its  
approval.*

*To Didera*  
s/Roslynn R. Mauskopf

*USDS  
2/4/2014*

**BY ECF**

Honorable Roslynn R. Mauskopf  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: United States v. Sassine Razzouk, 11 Cr. 430 (RRM)

Dear Judge Mauskopf:

We represent Mr. Razzouk in the above-captioned matter and write to respectfully request that the Court modify his conditions of pretrial release. Specifically, we request that the Court modify Mr. Razzouk's United States Pretrial Services ("Pretrial Services") reporting requirements and travel restrictions. We further request that Mr. Razzouk be permitted to renew his expired passport, which he previously surrendered to Pretrial Services.

Currently, Mr. Razzouk's conditions of pretrial release require him to report to Pretrial Services, in person, once a month and restrict his travel to the states of New York and New Jersey. Mr. Razzouk has complied with these requirements, and all conditions of his pretrial release, without incident. Since his arrest in January 2011, Mr. Razzouk travels from his home on Staten Island to Brooklyn monthly to report to Pretrial Services. Due to some health related issues and the distance, however, monthly in-person reporting has become burdensome. Therefore, we request that the Court permit Mr. Razzouk to report to Pretrial Services in person once every three months and to report telephonically during the other months.

In addition, we request that Mr. Razzouk's travel restrictions be modified to permit him to travel within the contiguous United States. Mr. Razzouk, who we submit has demonstrated that he is not a risk of flight,<sup>1</sup> has been unable to secure employment in New York

<sup>1</sup> As the Court may recall, in May 2012 Mr. Razzouk applied for and received the Court's permission to travel to Lebanon for his father's 80<sup>th</sup> birthday. At that time, the Court entered an

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or New Jersey and would like to attempt to secure employment in other jurisdictions. He also would like to travel with his family without burdening the Court with additional travel requests.

Lastly, Mr. Razzouk's current passport, which was surrendered to Pretrial Services in 2011, is expired. Mr. Razzouk seeks to renew his passport so that if there is an emergency related to his father's health he may leave immediately if the Court grants any overseas-travel request. He will, of course, surrender the renewed passport immediately upon receipt. Accordingly, we request that Mr. Razzouk be permitted to retrieve his expired passport from Pretrial Services for a period of time not to exceed one week so that he may renew his passport and then promptly surrender it to Pretrial Services.

We have discussed the above-requests with Assistant United States Attorney Lan Nguyen, and she has informed us that she does not object to our requests. We left a message for Mr. Razzouk's Pretrial Services Officer, Alfonso Fernandez, regarding our requests on January 9, 2014, but have not heard back from him as of the date of this letter. We understand that Officer Fernandez is aware of Mr. Razzouk's request to modify his in-person reporting requirements and has no objection to that request. Should the Court require any further information in connection with these requests, I can be reached at the number listed above. Thank you for your consideration.

Respectfully,



E. Scott Morvillo

cc: Assistant United States Attorney Lan Nguyen  
United States Pretrial Services Officer Alfonso Fernandez

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Order Modifying Bail Conditions for Mr. Razzouk to travel. The Order increased the amount of the Secured Appearance Bond from \$500,000 to \$750,000; the property secured is located at 10 Woodvale Loop, Staten Island, New York 10309. Mr. Razzouk also executed a blanket waiver of extradition. He traveled to Lebanon without incident.